

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

RAYMOND SKELTON on behalf of
himself and all similarly situated persons,

Plaintiffs,

V.

NEW JERSEY DEPARTMENT OF
CORRECTIONS, MARCUS O. HICKS,
individually and in his official capacity,
John Doe Dietician, individually and in
their official capacity, John Doe Food
Service Director, individually and in their
official capacity, John Powell, individually
and in their official Capacity, DOES 1-200
(NJDOC FOOD SERVICE MANAGERS),
individually and in their official capacity,
DOES 201-400 (NJDOC Administrators),
individually and in their official capacity,
Does 401-500 (NJDOC Dieticians),
individually and in their official capacity,
Does 501-600, individually and in their
official capacity,

Defendants.

Case No.: 3:19-cv-18597

**MOTION FOR ADMISSION
PRO HAC VICE**

**MOTION FOR THE PRO HAC VICE ADMISSION OF
KEITH L. ALTMAN**

The above-referenced Plaintiff, through his undersigned counsel, hereby
moves this Court pursuant to Local Civil Rule 101.1, to specially admit Keith L.

Altman, Esquire to the bar of this Court for purposes limited to this particular case and to appear and practice before this Court in all proceedings and trial as co-counsel for the Plaintiff herein, and in support thereof, avers as follows:

1. Solomon M. Radner, who is a member of the bar of this Court, hereby moves for the *pro hac vice* admission of Keith L. Altman, Esq.

2. Keith L. Altman is an associate of the law firm Excolo Law, PLLC, located at 26700 Lahser Rd Ste 401 Southfield, MI 48033, and is a member in good standing of the bars of the State of Michigan, as well as, the State of California, the United States District Courts for the District of Maryland, Southern, Eastern, Central and Northern Districts of California, Eastern and Western Districts of Michigan, Second, Sixth, Eighth, Ninth and Eleventh Circuit Courts of Appeals, and the United States Supreme Court.

3. Mr. Altman has an existing attorney-client relationship with the Plaintiff herein. He has experience in legal matters relating to this lawsuit and is familiar with the issues raised in this lawsuit.

4. Solomon M. Radner, the attorney of record in this matter, will continue to serve as counsel of record for the Plaintiffs herein, and will sign all pleadings, briefs, stipulations, and other papers filed with the Court. *See* Certification of Solomon M. Radner, attached hereto as **Exhibit A**.

5. Mr. Radner will participate in all proceedings pursuant to Local Rule 101.1.

6. Mr. Altman agrees to submit to all rules of practice and procedure for this Court, and will work closely with the attorney of record, Solomon M. Radner in connection with this case. *See* Certification of Keith L. Altman, attached hereto as **Exhibit B**.

7. The information required by D.N.J. L. Civ. R. 101.1(c)(2) will be provided to the New Jersey Lawyer's Fund for Client Protection within twenty-one (21) days of the entry of the Court's Order admitting Mr. Altman *pro hac vice*, and the fee required by New Jersey Court Rule 1:28-2 will also be paid within twenty-one (21) days of entry of the Order.

8. A check in the amount of \$150.00, made payable to "Clerk, United States District Court," for the fee required by D.N.J.L. Civ. R. 101.1(c)(3) for *pro hac vice* admission to the District Court for the District of New Jersey is included with this Motion.

WHEREFORE, Solomon M. Radner, counsel of record for the Plaintiff herein, respectfully requests that this Honorable Court admit Keith L. Altman *pro hac vice* pursuant to Local Rule 101.1 of the United States District Court for the District of New Jersey.

Respectfully submitted

EXCOLO LAW, PLLC

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Dated: February 19, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of July 2019, I served all opposing counsel with a copy of the foregoing document, by filing same with the Clerk of Court using the CM/ECF system which will send notification of such filing electronically to all counsel of record.

/s/ Solomon M. Radner
Solomon M. Radner